



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, DC 20240

JUL 27 2012

Re: **Green Hill Farms Hotel, 6 East Lancaster Avenue, Philadelphia, Pennsylvania**
Project Number: 25996

Dear

I have concluded my review of your appeal of the decision of Technical Preservation Services (TPS), National Park Service, denying certification of the rehabilitation of the property cited above. The appeal was initiated and conducted in accordance with Department of the Interior regulations (36 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank you and

for meeting with me in Washington on May 31, 2012, and for providing a detailed account of the project.

After careful review of the complete record for this project, including the additional information submitted by following our meeting, I have determined that the rehabilitation of the Green Hill Farms Hotel is not consistent with the historic character of the property, and that the project does not meet Standards 2, 5, and 9 of the Secretary of the Interior's Standards for Rehabilitation (the Standards). Therefore, the denial issued on April 20, 2012, by TPS is hereby affirmed.

Built in 1919, the Green Hill Farms Hotel served as such until its acquisition by the Eastern Baptist Theological Seminary in 1939. The hotel, designed by the nationally prominent Philadelphia architect Horace Trumbauer, originally consisted of a main building and a separate garage building, later assembled into a single structure by the construction of the "connector" wing. The seminary added a separate chapel building to the site in 1951, designed by William Harold Lee, a prominent theater architect. In recognition of its significance in architecture and in the history of religion, the property was listed individually in the National Register of Historic Places on December 15, 2011. TPS found that the proposed rehabilitation of the "certified historic structure" at issue here did not meet the Standards owing to the planned excavation of "walk-out patios" and, on the interior, the proposed narrowing of the main corridor on the upper floors and changes to the large ground-floor dining room. TPS also noted that the application did not provide sufficient information to evaluate the work proposed for the garage, for the connector from that portion of the property to the main building, and for the chapel (the latter structure proposed for rehabilitation in a later phase of the project).

With regard to the lack of information concerning the garage and connector wings of the hotel building, the additional photographs of the connector and garage are sufficient to show that the proposed rehabilitation of those sections of the building is acceptable. Consequently, the rehabilitations of the garage and the connector have not entered into my decision. With regard to the lack of information concerning the chapel building, although no additional information was presented for the conversion of the chapel to other uses in a later project phase, I have determined that the possible new uses for the

chapel that you discussed are not incompatible with its historic character, and thus an evaluation of this future phase of the overall project can properly be deferred at this point.

With regard to removing the French doors in the ground-floor dining room, I note the revised plan presented at our meeting and the subsequent information supplied by _____ confirm that the French doors in the dining room will not be removed as initially proposed. Consequently, those changes to the dining room have not entered into my decision

With regard to the proposed excavation of walk-out patios, I agree with TPS in general that they would impair the historic character of the Green Hill Farms Hotel. The proposed patios would require excavations as much as twelve feet deep and extending twelve feet out from the face of the building across extensive sections of the building's two street facades. These excavations would create new features that are incompatible with the historic character of the building, and that would also alter the building's setting in its environment to a remarkable and dramatic degree. As a result, I have determined that these new features cause the proposed project to conflict with Standards 2 and 5, cited by TPS, as well as Standard 9. Standard 2 states: *"The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided."* Standard 5 states: *"Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved."* Standard 9 states: *"New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."*

I have considered the factors discussed in our meeting that may lessen the impact of the excavations along the City Avenue (south) facade of the property. I acknowledge that the building sits quite far back from City Avenue and that the patios would not be visible from City Avenue, especially given the number of trees and density of other vegetation at that edge of the property. You also stated that the description by TPS of the new approach to the building entrance on the south wing as a "bridge" is inaccurate; in reality it will be a ramp or berm with solid earth beneath. I note that the topography of the site, which slopes sharply downward toward the west end of the south wing, and the lack of a sidewalk or parking lot close to the south wing, allows the required excavations to be created with sloped berms rather than with vertical retaining walls. As a result, I have determined that adding walk-out patios along the south facade to be marginally acceptable. Consequently, at this location, the walk-out patios have not entered into my decision.

However, the site constraints along the Lancaster Avenue (east) facade present entirely different challenges. Lancaster Avenue is closer to the building than City Avenue, the topography there is flat, there is little vegetation and only a few small trees between the street and the building, and there is a parking lot approximately twenty-five feet from the facade. In this location, the excavations will resemble a dry moat, twelve feet across and twelve feet deep along the west facade with a retaining wall topped by a safety fence. Also, the excavation will be deep enough that it will potentially expose the (probably unfinished) foundations of the building. Further, the proximity of the parking lot will limit the ability to plant vegetative screening. As a result, at this location, I have determined that the proposed walk-out patio excavations are not acceptable because they are fundamentally incompatible with the historic character of the building and its environment, contravening Standards 2, 5, and 9, cited above.

With regard to changes to the upper floors, I agree with TPS that narrowing the principal corridor on the upper floors also brings the proposed rehabilitation into conflict with Standards 2 and 5, cited above. Main corridors are almost always "character-defining features" of historic buildings, as indeed they are of all buildings. Narrowing them not only causes the loss of historic fabric (even when the historic trim is

intended for salvage and reinstallation, as here), but it also causes irreparable damage to the historic circulation pattern and sense of space that are key to how a building functions.

Narrowing the corridor, however, is only one aspect of the proposed changes to the upper floors. At our meeting, it became clear that the rehabilitation will involve the demolition of virtually all partitions on floors two, three, and four. Granted, the Standards permit greater latitude in changing secondary spaces such as individual hotel rooms or rooms for seminary students compared with primary spaces such as lobbies, assembly rooms, and corridors. Nevertheless, in this case, I find that the wholesale removal of historic fabric contemplated here further causes the overall project to contravene Standards 2 and 5, cited above. I understand that TPS did not specifically cite the demolition of partitions other than the corridor walls in its letter of April 20, 2012. Please note, however, that Department of the Interior regulations governing the program state that, "*The Chief Appeals Officer may base his decision in whole or part on matters or factors not discussed in the decision appealed from.*" [36 CFR §67.10(c).]

As Department of the Interior regulations state, my decision is the final administrative decision with respect to the April 20, 2012, denial that TPS issued regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,

A handwritten signature in dark ink, appearing to read "John A. Burns", with a long, sweeping horizontal line extending to the right.

John A. Burns, FAIA
Chief Appeals Officer
Cultural Resources

cc: SHPO-PA
IRS